

Before The  
Federal Communications Commission  
Washington, D.C. 20554

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In the matter of )  
Replacement of Part 90 by )  
Part 88 to Revise the )  
Private Land Mobile Radio )  
Services and Modify the )  
Policies Governing Them. )

PR Docket 92-235

To: The Commission

**REPLY COMMENTS OF  
THE STATE OF NEVADA  
DEPARTMENT OF WILDLIFE**

The State of Nevada, Department of Wildlife, hereby submits its reply comments in response to the Commission's Notice of Proposed Rule Making.

We support the Forestry Conservation Communications Association, the State of Idaho and others in their comments regarding interoperability requirements between State and Federal agencies; the channel bandwidth/spacing for each must be the same in order to maintain the ability to communicate. The State of Nevada, Department of Wildlife has agreements with all Federal agencies with which we have need to communicate, and has implemented the ability to communicate with these Federal agencies from our mobile units. Therefore we respectfully request

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that commonality in channel bandwidth/spacing in the IRAC administered frequencies of the Federal government and the FCC administered frequencies allocated to Public Safety entities be made the same in any Report and Order in this proceeding.

We agree with the Land Mobile Communications Council's (LMCC) comments, known as the "Consensus Plan" in the areas of the "Safe Harbor" chart and contour option, and the migration plan identified as Option "A". We believe that the narrowest bandwidth allowed must be sufficient to transmit necessary intelligence. We insist that any migration to narrower bandwidths be paced so that full equipment amortization can be realized. We disagree with Option "B" specifically because it appears to us to be too ambitious for Public Safety agencies to reasonably accomplish.

We agree that a separate rule part for the Public Safety Radio Services would best ensure their licensees' communications needs are met in fulfilling the vital roles that Public Safety agencies have throughout the nation.

Finally, we desire to have the existing radio services presently identified within the Public Safety Radio

Services kept separate and intact, with their own blocks of frequencies to manage, and their own frequency coordinators. We agree with several of those making comments recommending that the Local Government and Fire frequencies each be made into contiguous blocks. We also concur with the need for some re-alignment of the frequencies presently allocated within the other services, in order to accomplish the needed changes within the Local Government and Fire radio services. We strongly disagree with the concept of "interleaving" frequencies from different services within any given block due to the likelihood of destructive interference.

We continue to support the Forestry-Conservation Communications Association in their role as the Certified Frequency Coordinator for the Forestry-Conservation Communications Association, and respectfully request that they be retained in that role. They continue to provide an excellent service to Forestry-Conservation licensees and applicants and the Commission in providing frequency coordination services with a high degree of excellence and responsiveness to our user needs.

Thank you for the opportunity to reply to comments made on the subjects raised in this docket.

Respectfully Submitted,  
State of Nevada, Department of Wildlife

By: Robert P. McQuivey  
Robert P. McQuivey, Acting Director  
State of Nevada  
Department of Wildlife

Date: July 29, 1993